

In The United States District Court
For the District of Columbia

_____ Joseph A. Camp)	
-Plaintiff)	
)	Case Number: 12-cv-01726-ABJ
v.)	
)	
United States Department of Justice)	
-Defendant)	
_____)	

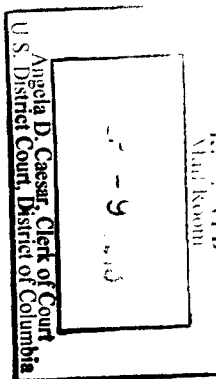
PLAINTIFF'S MOTION TO CONTINUE STAY

COMES NOW, Joseph A. Camp, Plaintiff in the above captioned matter, seeking to join Defendant's suggestion to "continue the stay until the resolution of" Plaintiff's criminal appeal.

1. By Minute Order dated May 6, 2013, the Court granted Plaintiff Joseph Camp's ("Plaintiff") Motion to Stay, wherein Plaintiff requested that the Court stay these proceedings "until the Plea-agreement has been accepted in full by the Criminal Court in the Western District of Missouri, and Plaintiff has been sentenced to the terms of the plea-agreement, at which time the Plaintiff will not contest the Defendant's Motion for Dismissal." ECF No. 31 ¶ 6.

2. On April 12, 2013 during the change of plea hearing, Judge Brian C. Wimes of the United States District Court for the Western District of Missouri, Western Division, accepted the plea agreement between the parties. See United States v. Camp, No. 4:10-CR-00318-BCW-1, ECF No. 223 at 35 ll. 18-20 (W.D. Mo.)

3. Plaintiff was sentenced to 36 months incarcerated, however he was not sentenced to the full terms of the plea agreement, and thereby making the plea invalid. Plaintiff attempted to withdraw from the plea at the time of his sentencing, when it became apparent that the Government was seeking enhancement of the plea, and that the Judge was agreeing to do so. (See Sentencing Minutes, not available to Plaintiff at this time.) Thus Plaintiff has withdrawn from one of two agreements and was



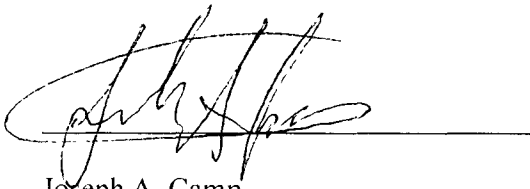
sentenced in violation of the terms of the binding plea. There is considerable question as to how the Freedom of Information Act waiver contained in the Missouri plea agreement affects this matter.

4. Thus, Plaintiff is currently appealing the sentence and conviction.

5. Plaintiff reiterates the facts in Doc. 34 of this case.

WHEREFORE, for these reasons, Plaintiff joins the Defendant's suggestion that the stay of this matter continue until such time that the appeal can be finalized, or in the alternative, for the reasons previously set forth in Plaintiff's Motion Summary Judge, and In Opposition to Defendant's Motion to Dismiss, Plaintiff seeks Summary Judgment in his favor and the release of the records requested, and such other and further relief as this Court deems just and proper.

Respectfully;

A handwritten signature in black ink, appearing to read 'Joseph A. Camp', is written over a horizontal line.

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NEVER
TOO LATE!

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